

# REMARKS

Claims 1-14 and 26-35 were previously pending in the present application, with claims 16-25 being withdrawn. As noted above, claims 1, 3, 4, 6, 8, 11, 13, 14, 26, 28, 30, 32 and 34 have been amended, claims 2, 12 and 16-25 have been canceled, and claims 36-47 have been added. These amendments and new claims are fully supported throughout the Specification.<sup>1</sup> Thus, after entry of these amendments, claims 1, 3-11, 13, 14 and 26-47 are pending.

In the Final Rejection mailed April 14, 2008, claims 1-2, 5-14, and 26-35 were rejected under 35 U.S.C. 103(a) as being obvious over Chuang (U.S. Patent Publication 20040207604) in view of Enger et al. (U.S. Patent Publication 20050020325). Further, claims 1-6, 8-14, and 26-35 were rejected under 35 U.S.C. 103(a) as being obvious over Jellicoe (U.S. Patent Number 7,107,018) in view of Enger. Additionally, claim 7 was rejected under 35 U.S.C. 103(a) as being obvious over Jellicoe in view of Enger and further in view of Pihlaja (U.S. Patent Number 7,009,599).

In the Advisory Action mailed June 11, 2008, the Examiner withdrew the rejection of claims 1-2, 5-14, and 26-35 under 35 U.S.C. 103(a) as being obvious over Chuang in view of Enger based on the Request For Reconsideration filed by Applicants on May 7, 2008.

Therefore, the outstanding rejections addressed in this response are the rejections of claims 1-6, 8-14, and 26-35 under 35 U.S.C. 103(a) as being obvious over Jellicoe in view of Enger, and the rejection of claim 7 as being obvious over Jellicoe in view of Enger and further in view of Pihlaja.

Applicants respectfully request the Examiner to reconsider the present application based on the following remarks.

## **Response to the Rejection of Claims 1-6, 8-14, and 26-35 Under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claims 1-6, 8-14, and 26-35 under 35 U.S.C. 103(a) as being unpatentable over Jellicoe in view of Enger.

As noted above, claims 2 and 12 have been canceled, and thus this rejection is moot with respect to claims 2 and 12.

With respect to independent claim 1, there is no combination of Jellicoe and Enger that discloses or suggests an apparatus having the recited overlap area and the recited electrical

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<sup>1</sup> See, e.g., Specification, paragraphs 0013, 0022, 0026, 0030, 0032, 0035-0038 and 0042.

connections disposed in the overlap area, wherein the overlap area is defined between the display and the keyboard assembly, wherein the overlap area is common to deployment in both the first direction and the second direction, and wherein the electrical connections are between the display and the first key arrangement and between the display and the second key arrangement.

To establish a *prima facie* case of obviousness, all of the claimed features must be taught or suggested by the references and there must be some suggestion or motivation, in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings.<sup>2</sup>

Jellicoe fails to teach or suggest the recited language of claim 1. In particular, Jellicoe is silent with respect to electrical connections between the display panel and each of the first keypad and the second keypad, as presently recited. Furthermore, Jellicoe does not disclose or suggest an overlap area common to deployment in both the first direction and the second direction, wherein the electrical connections are between the display and the first key arrangement and between the display and the second key arrangement in the overlap area, as presently recited. Thus, without any disclosure or suggestion of the recited subject matter, Jellicoe fails as a reference under 35 USC § 103.

Further, the addition of Enger fails to solve the deficiencies of Jellicoe, as Enger also is silent with respect to the recited subject matter.

Therefore, claim 1 is patentable over any combination of Jellicoe and Enger.

Claims 3-6 and 26-27 depend from independent claim 1, and thus are also allowable for at least the same reasons. Further, each of these claims separately recites subject matter not disclosed or suggested by any combination of Jellicoe and Enger.

For example, referring to claim 6, there is no combination of Jellicoe and Enger that discloses or suggests an apparatus wherein the sliding connection comprises a track connected to the display and carrier connected to a surface of the keyboard assembly facing the display. In contrast, Jellicoe discloses opposed pairs of slides on the edges of the respective housings, where the slides include cooperating C-shaped guides on side surfaces of the housings.<sup>3</sup> As such, Jellicoe teaches away from connecting a carrier to a surface of the keyboard assembly facing the display, as in the presently recited subject matter of claim 6. Furthermore, Enger fails to solve

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<sup>2</sup> M PEP, section 2142.

<sup>3</sup> See, e.g., Jellicoe, col. 4, lines 17-31 and Figs. 2-3.

the deficiencies of Jellicoe, as Enger discloses a rotating connection. Thus, claim 6 is patentable over any combination of Jellicoe and Enger.

Also, for example, referring to claim 26, there is no combination of Jellicoe and Enger that discloses or suggests an apparatus further comprising a first Hall effect sensor positioned in the display, a magnet positioned in the keyboard assembly adjacent to the first key arrangement, and a second Hall effect sensor positioned in the keyboard assembly adjacent to the second key arrangement, wherein the first Hall effect sensor and the second Hall effect sensor are operable to respectively determine deployment of the keyboard assembly in the first direction and the second direction based on sliding movement relative to the magnet, as presently recited. Jellicoe fails to disclose or suggest any sensor for determining deployment of the keyboards. Enger fails to overcome the deficiencies of Jellicoe, as Enger fails to disclose or suggest the recited magnet and Hall effect sensors operable to respectively determine deployment of the keyboard assembly in the first direction and the second direction based on sliding movement relative to the magnet, as presently recited. As noted above, Enger teaches away from the recited subject matter by disclosing a rotating connection. Thus, claim 26 is patentable over any combination of Jellicoe and Enger.

With respect to independent claims 8, 13 and 14, there is no combination of Jellicoe and Enger that discloses or suggests a method, an apparatus, or a processor including the action or means for receiving a communication corresponding to a non-operating one of the first operational mode and the second operational mode, the action or means for generating a prompt to switch from the operating one to the non-operating one of the first operational mode and the second operational mode in response to the received communication, the action or means for detecting a change in the direction in which the keyboard assembly is deployed corresponding to the switch from the operating one to the non-operating one of the first operational mode and the second operational mode, and the action or means for changing the orientation of the information presented on the display with reference to the change in the direction in which the keyboard assembly is deployed, as presently recited.

Jellicoe and Enger are both completely silent with respect to the recited subject matter.

Thus, independent claims 8, 13 and 14 are patentable over any combination of Jellicoe and Enger.

Claims 9, 10, 28, 29 and 32-35 depend from respective ones of independent claims 8, 13 and 14, and thus are also allowable for at least the same reasons. Further, each of these claims separately recites subject matter not disclosed or suggested by any combination of Jellicoe and Enger.

For example, referring to claims 28, 32 and 34, there is no combination of Jellicoe and Enger that discloses or suggests a method wherein each of the detecting of the direction in which the keyboard assembly is deployed and the detecting of the change in the direction in which the keyboard assembly is deployed further comprises determining relative sliding movement of the magnet with respect to one of the first Hall effect sensor or the second Hall effect sensor, or an apparatus or processor wherein the first Hall effect sensor and the second Hall effect sensor are operable to respectively generate a signal indicating deployment of the keyboard assembly in the first direction and the second direction based on sliding movement relative to the magnet, wherein the means for detecting a direction in which the keyboard assembly is deployed and the means for detecting a change in the direction in which the keyboard assembly is deployed are operable to receive a respective signal. As noted above, Jellicoe fails to disclose or suggest any sensor for determining deployment of the keyboards. Further, Enger fails to overcome the deficiencies of Jellicoe, as Enger fails to disclose or suggest the recited sliding movement. As noted above, Enger teaches away from the recited subject matter by disclosing a rotating connection. Thus, claims 28, 32 and 34 are patentable over any combination of Jellicoe and Enger.

With respect to independent claim 11, there is no combination of Jellicoe and Enger that discloses or suggests an apparatus operable to generate a prompt to switch between an operating one and a non-operating one of the first operational mode and the second operational mode in response to a received communication corresponding to the non-operating one of the first operational mode and the second operational mode. As noted above, Jellicoe and Enger are both completely silent with respect to receiving the recited communication. Thus, independent claim 11 is patentable over any combination of Jellicoe and Enger.

Claims 30 and 31 depend from independent claim 11, and thus are also allowable for at least the same reasons. Further, each of these claims separately recites subject matter not disclosed or suggested by any combination of Jellicoe and Enger.

For example, referring to claim 30, Jellicoe and Enger fail to disclose or suggest the recited apparatus further comprising a first Hall effect sensor positioned in the display, a magnet positioned in the keyboard assembly adjacent to the first set of key arrangement, and a second Hall effect sensor positioned in the keyboard assembly adjacent to the second set of key arrangement, wherein the first Hall effect sensor and the second Hall effect sensor are operable to respectively determine deployment of the keyboard assembly in the first direction and the second direction based on sliding movement relative to the magnet. Jellicoe provides no teaching of any sensor, while Enger teaches away from the recited subject matter by disclosing a rotating connection. Therefore, claim 30 is patentable over any combination of Jellicoe and Enger.

Thus, based on these remarks, Applicants respectfully request that the Examiner withdraw the rejection of claims 1-6, 8-14, and 26-35 under 35 U.S.C. 103(a) as being unpatentable over Jellicoe in view of Enger.

#### **Response to the Rejection of Claim 7 Under 35 U.S.C. § 103(a)**

Applicants respectfully traverse the rejection of claim 7 under 35 U.S.C. 103(a) as being unpatentable over Jellico in view of Enger and further in view of Pihlaja.

Applicants respectfully submit that any combination of Jellico, Enger and Pihlaja fails to disclose or suggest the recited subject matter. In particular, claim 7 depends from independent claim 1, which are believed to be patentable over Jellico and Enger as noted above. Further, Pihlaja fails to address the above-noted failures of Jellico and Enger. Thus, claim 7 is also non-obvious and patentably distinguishable over the cited prior art references.<sup>4</sup> Further, claim 7 separately recites subject matter not disclosed or suggested by any combination of the cited references.

Therefore, Applicants respectfully request that the Examiner withdraw the rejection of claim 7 under 35 U.S.C. 103(a) as being unpatentable over Jellico in view of Enger and further in view of Pihlaja.

#### **New Claims**

Applicants have added new claims 36-47 to recite subject matter to which they are entitled. As noted above, these new claims are fully supported throughout the Specification.

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<sup>4</sup> M PEP 2143.03.

Additionally, claims 36-47 are allowable, as there is no combination of the cited references that discloses or suggests the subject matter recited by these claims.

In particular, claims 36-47 respectively depend from one of independent claims 1, 8, 11, 13 and 14, which are believed to be patentable over any combination of the cited references, as discussed above. Thus, for at least the same reasons, claims 36-47 are also non-obvious and patentably distinguishable over the cited prior art references.<sup>5</sup>

Further, each of these claims separately recites subject matter not disclosed or suggested by any combination of the cited references.

For example, there is no combination of the cited references that discloses or suggests that the electrical connections comprise a flexible circuit material, as recited by claim 36.

Also, for example, there is no combination of the cited references that discloses or suggests the respective pairs of tracks and the respective pairs of carriers, as recited by claim 38.

Moreover, for example, there is no combination of the cited references that discloses or suggests the application having the recited aspect ratios, as recited by claim 39.

Therefore, Applicant respectfully requests that the Examiner allow claims 36-47.

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<sup>5</sup> MPEP 2143.03.

**CONCLUSION**

In light of the remarks contained herein, Applicants submit that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

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